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September 11, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: August 2007 Monthly Status Report, Gulfo Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Validation of laboratory analyses of soil samples from five background locations within the City of Freeport right-of-way immediately south of Marlin Avenue was completed. Evaluation of these validated data was performed. A letter proposing the analyte list for surface soil samples collected from Lots 19 and 20 west of the Site in April 2007 was sent to you on August 20, 2007.
 - Subtask 6.5 – Validation of laboratory analyses of Phase 2 groundwater samples, and a soil sample from the boring for monitoring well ND3MW29 was completed. Evaluation of these and other data from Phase 2 groundwater activities was performed.



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2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - The validation report for the background soil sample analyses described above is provided in electronic form on the enclosed DVD.
 - The validation report for the Phase 2 groundwater sample analyses described above is provided in electronic form on the enclosed DVD.
 - The validation report for the soil sample from the boring for monitoring well ND3MW29 analyses described above is provided in electronic form on the enclosed DVD.
 - The updated database, including all data validated through August 31, 2007 is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through soil sample analyses, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through water level measurement and data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 50% complete. No delays were encountered this month.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Attachments

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cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Robert L. Iulucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP